



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 301 S. PARK, DRAWER 10096
HELENA, MONTANA 59626-0096

Ref: 8MO

July 10, 2000

Mr. Rick Prausa, Forest Supervisor
Lewis and Clark National Forest
1101 15th Street North
Box 869
Great Falls, Montana 59403

Re: Draft EIS for the Proposed Rocky Mountain
Front Mineral Withdrawal EIS–Lewis and
Clark and Helena National Forests

Dear Mr. Prausa:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Environmental Protection Agency, Region VIII, Montana Office (EPA) has reviewed the above-referenced Draft Environmental Impact Statement (DEIS).

The EPA is supportive of the Forest Service's proposal to withdraw from locatable mineral entry, 429,000 acres of National Forest System lands along Montana's Rocky Mountain Front in Glacier, Pondera, Teton, and Lewis and Clark Counties, within the Lewis & Clark and Helena National Forests for a period of up to 20 years. We agree that the preservation of this area for traditional Native American cultural purposes, protection of threatened and endangered species, and preservation of the outstanding scenic values and roadless character has great merit. We note that Glacier National Park is directly north of the study area, and the Great Bear, Bob Marshall, and Scapegoat Wilderness areas are west of the study area, and the Blackfeet Indian Reservation is adjacent to the northeast boundary.

Hardrock mining impacts to water quality, especially from acid rock drainage and metal and nitrogen contamination of surface and ground waters have been a source of significant concern to the EPA. While the DEIS did not focus much on the potential for acid rock drainage and/or metal or nutrient transport or pollution to occur during mineral exploration and development on the Rocky Mountain Front, we believe such water pollution risks are often associated with hardrock mining activities, and that such pollution risks cannot be totally eliminated with the No Mineral Withdrawal Alternative. We agree with the statement in the DEIS (page 28) that the only way to achieve a "no risk" goal is to withdraw the area.



There is a particular need to protect the public from mining caused water pollution, and to protect the taxpayer from the expense of reclamation and remediation following hardrock mine financial failures. American taxpayers are faced with significant liability for mines left unreclaimed, with the economic burden for mine clean up shifted from the companies that profited from the mines, leaving environmental problems for the public to clean up, including mines in Montana (e.g., Zortman-Landusky Mine in northeastern Montana owned by Zortman Mining Inc., and Pegasus Mining Inc.).

The EPA supports the Forest Service's preferred alternative to withdraw the Rocky Mountain Front study area from locatable mineral entry. The EPA review did not identify any potential environmental impacts requiring substantive changes to the proposal, and we consider the Forest Service's preferred alternative, Alternative B, recommending mineral withdrawal to be the environmentally preferred alternative.

We do recommend that clarification be provided in regard to the 429,000 acres proposed for mineral withdrawal. It is stated on page 1 of the DEIS that the study area consists of approximately 429,000 acres of both private and federal lands, consisting of 424,000 acres of National Forest lands and 5,000 acres of scattered private land. Since we understand that private land would be unaffected by the proposed mineral withdrawal, it is not clear to us why the mineral withdrawal is for 429,000 acres (i.e., including the 5,000 acres of private lands) rather than 424,000 acres of National Forest land? This discrepancy should be corrected.

Another area of clarification that would be helpful regards the apparent contradiction between the statement on page 17 of the DEIS that, "there are no identified mineral resources in the project area," and subsequent statements on page 18 where it is stated that; "within the withdrawal area, anomalous amounts of copper occur in green beds in all Belt Series rocks"; "the second deposit type of stratabound mineral occurrence consists of lead and zinc (locally containing copper and silver) in calcareous quartzites in the lower part of the predominantly carbonate Helena Formation," and "stratabound copper-silver occurrences have been discovered in the Alice Creek area on the Helena National Forest." The statements describing mineral occurrences on page 18 and elsewhere seem to contradict the statement on page 17 indicating that no mineral resources have been identified in the project area. Perhaps this confusion could be cleared up by stating that no economically developable mineral resources have been identified within the project area.

The EPA appreciates the efforts of the Forest Service to prepare an EIS for this mineral withdrawal project. Based on the procedures EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action and alternatives in an EIS, the Draft Environmental Impact Statement For The Proposed Rocky Mountain Front Mineral Withdrawal has been rated as Category LO (Lack of Objections). A copy of EPA's rating criteria is attached.

The EPA appreciates the opportunity to review and comment on the DEIS. If you have any questions please contact Mr. Steve Potts of my staff in Helena at (406) 441-1140 ext. 232.

Sincerely,

Original Signed by John F. Wardell

John F. Wardell
Director
Montana Office

cc: Cindy Cody/Yolanda Martinez, EPA, 8EPR-EP, Denver
James Dunn, EPA, 8EPR-EP, Denver
Elaine Suriano, EPA, OFA, Washington DC